

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

REYNOLDS SHIPPING USA LLC, §
Plaintiff

v.

JPMORGAN CHASE BANK, N.A., §
Garnishee, and

MINISTRY OF TRADE FOR §
THE REPUBLIC OF IRAQ, §
Judgment Debtor

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Civil Action No.: _____

Returnable: _____

INTERROGATORIES DIRECTED TO GARNISHEE

TO: JPMorgan Chase Bank, N.A., by and through its registered agent, CT Corporation System, 350 N. St. Paul St., Suite 2900, Dallas, Texas 75201-4234.

NOTE: This garnishment is directed to any and all property belonging to and assets of Defendant and Judgment Debtor, Ministry of Trade for the Republic of Iraq and/or The Trade Bank of Iraq or any other account which holds funds or handles payment on behalf of the Ministry of Trade of the Republic of Iraq ("Judgment Debtor"), including but not limited to any and all depository accounts held in the name of or for the benefit of Judgment Debtor any income or debts due to said Judgment Debtor, and any other property of whatever type belonging to Judgment Debtor individually or jointly with any other person or entity, which is in your custody or control, and which is subject to garnishment.

INSTRUCTIONS: You are to answer interrogatories UNDER OATH within ten (10) days after the return date of the writ and mail the ORIGINAL to:

Clerk, United States District Court
P.O. Box 61010
Houston, Texas 77208

And a COPY to the attorney for the Judgment Creditor listed below:

Joanne M. Ericksen
The Ericksen Law Firm
1415 S. Voss
Suite 110-423
Houston, Texas 77057

Comes now, Plaintiff, REYNOLDS SHIPPING USA LLC, pursuant to Rule 69 of the Federal Rules of Civil Procedure and submits the following interrogatories to be answered by Garnishee, under oath within ten (10) days of the returnable date.

1. At the time of service of the garnishment, had you, or have you since that time had, or have you now in your possession, custody, or charge, any goods, chattels, monies, credits or effects belonging to the Defendant and Judgment Creditor, Ministry of Trade for the Republic of Iraq and/or The Trade Bank of Iraq or any other account which holds funds or handles payment on behalf of the Ministry of Trade of the Republic of Iraq ("Judgment Debtor"), or jointly with any other person or entity? If so, state what they were or are, their value, and identify each joint or co-owner, and attach copies of any documents reflecting the identity and/or ownership of any such goods, chattels, monies, credits or effects to your answer.

ANSWER:

2. At the time of service of the garnishment, were you, or have you since become, or are you now in any way, indebted to Judgment Debtor? If your answer is "yes," state to what extent and in what manner the debt accrued, and if evidenced by any instrument in writing, describe the same and state what has become of the same and under whose custody it is held, and attach a copy of this instrument to your answer.

ANSWER:

3. At the time you were summoned as Garnishee, or since that time, have you become, or are you now bound under any contracts to pay the Judgment Debtor, directly or to any other party on account of Judgment Debtor, any monies which are not yet due? If your answer is "yes," state the nature of said contract, the names of the contracting parties, the amount of money to become due thereunder, when the same was or is due and payable, exactly to whom the money is due and attach a copy of said contract to your answer.

ANSWER:

4. Have you paid to Judgment Debtor, or to anyone acting as its agent, or to anyone or any entity acting in its behalf, or to anyone or any entity on account of Judgment Debtor, any money, property or effects since the time of garnishment summons herein was served on you? If your answer is “yes,” state when the same was paid, the amount and nature of said payment and to whom it was paid, in what capacity the recipient received it and if paid under the terms of a contract, attach a copy of said contract.

ANSWER:

Respectfully Submitted,

THE ERICKSEN LAW FIRM

JOANNE M. ERICKSEN
TBA No. 24036529
1415 S. Voss, Suite 110-423
Houston, Texas 77057
(832) 588-3346
(281) 936-0196 (fax)
ATTORNEY FOR PLAINTIFF

ATTESTATION TO BE COMPLETED BY GARNISHEE

STATE OF TEXAS §

§

COUNTY OF _____ §

_____, being first duly sworn and upon oath states that the foregoing answers to Interrogatories are true and correct to the best of his/her knowledge, information and belief.

By: _____

Sworn to and subscribed before me by _____ on this _____ day of _____, 2013.

Notary Public in and for the State of Texas

My commission expires: _____

GARNISHEE'S CERTIFICATE OF SERVICE

A copy of the foregoing Answers of Garnishee to Interrogatories were served upon Joanne M. Ericksen, attorney for Plaintiff, at The Ericksen Law Firm, 1415 S. Voss, Suite 110-423, Houston, Texas 77057, Fax: (281) 936-0196, by mailing and/or faxing the same on this _____ day of _____, 2013.

By: _____